## 1 QUINN EMANUEL URQUHART & SULLIVAN, LLP 2 Diane M. Doolittle (CA Bar No. 142046) Andrew H. Schapiro (admitted *pro hac vice*) dianedoolittle@quinnemanuel.com andrewschapiro@quinnemanuel.com 3 555 Twin Dolphin Drive, 5th Floor 191 N. Wacker Drive, Suite 2700 Redwood Shores, CA 94065 Chicago, IL 60606 4 Telephone: (312) 705-7400 Telephone: (650) 801-5000 5 Facsimile: (650) 801-5100 Facsimile: (312) 705-7401 6 Stephen A. Broome (CA Bar No. 314605) Josef Ansorge (admitted *pro hac vice*) josefansorge@quinnemanuel.com stephenbroome@quinnemanuel.com 7 Carl Spilly (admitted *pro hac vice*) Viola Trebicka (CA Bar No. 269526) carlspilly@quinnemanuel.com 8 violatrebicka@quinnemanuel.com 1300 I. Štreet, N.W., Suite 900 865 S. Figueroa Street, 10th Floor Washington, D.C. 20005 9 Los Angeles, CA 90017 Telephone: 202-538-8000 Telephone: (213) 443-3000 Facsimile: 202-538-8100 10 Facsimile: (213) 443-3100 11 Jonathan Tse (CA Bar No. 305468) Jomaire A. Crawford (admitted *pro hac vice*) jomairecrawford@quinnemanuel.com 12 jonathantse@quinnemanuel.com 51 Madison Avenue, 22nd Floor 50 California Street, 22nd Floor 13 New York, NY 10010 San Francisco, CA 94111 Telephone: (212) 849-7000 Telephone: (415) 875-6600 Facsimile: (212) 849-7100 14 Facsimile: (415) 875-6700 15 Attorneys for Defendant Google LLC 16 UNITED STATES DISTRICT COURT 17 NORTHERN DISTRICT OF CALIFORNIA, OAKLAND DIVISION 18 19 CHASOM BROWN, et al., on behalf of Case No. 5:20-cy-03664-YGR themselves and all others similarly situated, 20 **DECLARATION OF STEPHEN A.** BROOME IN SUPPORT OF GOOGLE Plaintiffs, 21 LLC'S OPPOSITION TO PLAINTIFFS' MOTION FOR LEAVE TO AMEND 22 v. **COMPLAINT** 23 GOOGLE LLC, The Honorable Yvonne Gonzalez Rogers 24 Courtroom 1 – 4th Floor Defendant. Date: March 15, 2022 25 Time: 2:00 p.m. Amended Complaint Filed: April 15, 2021 26 Trial Date: None Set 27 28

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## I, Stephen A. Broome, declare as follows:

- I am a member of the bar of the State of California and a partner with Quinn Emanuel Urquhart & Sullivan, LLP, attorneys for Defendant Google LLC ("Google") in this action. I submit this declaration in support of Google's Opposition to Plaintiffs' Motion for Leave to Amend Complaint. I make this declaration of my own personal, firsthand knowledge, and if called and sworn as a witness, I could and would testify competently thereto.
- 2. Google has produced more than 6.8 million pages of documents from 43 custodians, and a dozen Google employees have sat for depositions. Numerous additional Googlers are set to be deposed in the coming weeks, in addition to the Googlers who will be put up for 30(b)(6) depositions.
- 3. Attached hereto as **Exhibit** 1 is a true and correct copy of Google's Responses and Objections to Plaintiffs' Interrogatories (Nos. 1-3), served on February 5, 2021.
- 4. Attached hereto as **Exhibit** 2 is a true and correct copy of a May 23, 2021 letter sent from Google to Plaintiffs.
- 5. Attached hereto as **Exhibit** 3 is a true and correct copy of excerpts from the transcript of the June 2, 2021 hearing before Magistrate Judge Van Keulen.
- 6. Attached hereto as **Exhibit** 4 is a true and correct copy of Google's Responses and Objections to Plaintiffs' Notice of Rule 30(b)(6) Deposition, served on June 11, 2021.
- 7. Attached hereto as **Exhibit** 5 is a true and correct copy of Google's Objections and Responses to Plaintiffs' Interrogatories Set 9 (Nos. 34-30), served on January 28, 2022.
- 8. Attached hereto as **Exhibit** 6 is a true and correct copy of a February 1, 2022 email sent from Plaintiffs to Google.
- 9. Attached hereto as **Exhibit** 7 is a true and correct copy of excerpts from the transcript of the February 11, 2021 Case Management Conference.
- 10. Attached hereto as **Exhibit** 8 is a true and correct copy of a February 16, 2022 email sent from Plaintiffs to Google.
- 11. Attached hereto as **Exhibit** 9 is a true and correct copy of excerpts from the rough transcript of the February 18, 2022 deposition of Rory McClelland.

1	12. Attached hereto as <b>Exhibit</b> 10 is a true and correct copy of a screenshot taken on
2	February 24, 2022 while visiting the website for Morgan & Morgan in Incognito mode and using
3	Chrome's "Developer Tools."
4	13. Attached hereto as <b>Exhibit</b> 11 is a true and correct copy of a screenshot taken on
5	February 24, 2022 while visiting the website for Boies Schiller Flexner LLP in Incognito mode and
6	using Chrome's "Developer Tools."
7	14. Attached hereto as <b>Exhibit</b> 12 is a true and correct copy of a screenshot taken on
8	February 24, 2022 while visiting the website for Susman Godfrey L.L.P. in Incognito mode and
9	using Chrome's "Developer Tools."
0	15. Attached hereto as Exhibit 13 is a chart of the documents bearing Google bates
1	numbers that were attached as exhibits to the February 3, 2022 Declaration of Mark C. Mao,
2	indicating the date each document was produced to Plaintiffs by Google.
3	16. Attached hereto as <b>Exhibit</b> 14 is a true and correct copy of the "How Chrome
4	Incognito keeps our browsing private" page, available at
5	https://support.google.com/chrome/answer/9845881?hl=en#zippy=%2Chow-incognito-mode-
6	works%2Chow-incognito-mode-protects-your-privacy%2Cyoure-in-control, and last accessed on
7	February 25, 2022.
8	I declare under penalty of perjury of the laws of the United States that the foregoing is true
9	and correct. Executed in Los Angeles, California on February 25, 2022.
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22	By /s/ Stephen A. Broome
23	Stephen A. Broome
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	2 Case No. 5:20-cv-03664-YG